FILED
At Albuquerque NM

APR 1 4 2015

MATTHEW J. DYKMAN
CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CRIMINAL NO. 15-1285 JB
	)	
vs.	)	Count 1: 18 U.S.C. §§ 1153, and 1111:
	)	First Degree Murder; 18 U.S.C. § 2: Aiding
ELIJAH SHIRLEY,	)	and Abetting;
MAYNARD SHIRLEY, and	)	
MICHAEL SHIRLEY,	)	Count 2: 18 U.S.C. §§ 1153, and 113(a)(6):
	)	Assault Resulting in Serious Bodily Injury;
Defendants.	)	18 U.S.C. § 2: Aiding and Abetting;
	)	
	)	Count 3: 18 U.S.C. §§ 1153, and 113(a)(3):
	)	Assault With a Dangerous Weapon;
	)	18 U.S.C. § 2: Aiding and Abetting.

INDICTMENT

The Grand Jury charges:

Count 1

On or about March 21, 2015, in Indian Country, in San Juan County, in the District of New Mexico, the defendants, **ELIJAH SHIRLEY**, an Indian, **MAYNARD SHIRLEY**, an Indian, and **MICHAEL SHIRLEY**, an Indian, did unlawfully kill John Doe 1, with malice aforethought, in that they killed John Doe 1 willfully, deliberately, maliciously, and with premeditation by stabbing him with a knife.

In violation of 18 U.S.C. §§ 1153, 1111, and 18 U.S.C. § 2.

Count 2

On or about March 21, 2015, in Indian Country, in San Juan County, in the District of New Mexico, the defendants, **ELIJAH SHIRLEY**, an Indian, **MAYNARD SHIRLEY**, an Indian, and **MICHAEL SHIRLEY**, an Indian, did knowingly and unlawfully assault John Doe 2, such assault resulting in serious bodily injury.

In violation of 18 U.S.C. §§ 1153, 113(a)(6), and 18 U.S.C. § 2.

Count 3

On or about March 21, 2015, in Indian Country, in San Juan County, in the District of New Mexico, the defendants, **ELIJAH SHIRLEY**, an Indian, **MAYNARD SHIRLEY**, an Indian, and **MICHAEL SHIRLEY**, an Indian, did knowingly and unlawfully assault John Doe 2, with a dangerous weapon, a knife, with intent to do bodily harm.

In violation of 18 U.S.C. §§ 1153, 113(a)(3), and 18 U.S.C. § 2.

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY

Assistant United States Attorney

04/10/15 1:47PM